

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

<b>E. K., Individually; E. K., by and through her next friend and mother, AMY ATKINS,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>vs.</b>	)	<b>CASE NO.: 3:07-cv-01083-MHT-TFM</b>
	)	
<b>CHILD DEVELOPMENT SCHOOLS, INC. d/b/a CHILDCARE NETWORK, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**MOTION FOR ADDITIONAL TIME TO SUBMIT  
CORPORATE/CONFLICT DISCLOSURE STATEMENT**

COMES NOW the defendant, Child Development Schools, Inc. d/b/a Childcare Network, and files this motion requesting additional time to submit its F.R.C.P. 7.1 corporate/conflict disclosure statement. In support of this request, this defendant would should unto the Court the following:

1. On December 14, 2007, this defendant removed this lawsuit to this Court from the Circuit Court of Russell County, Alabama.
2. On the same date, the clerk's office generated a "Notice of Deficiency" directing this defendant to submit its F.R.C.P. 7.1 corporate/conflict disclosure statement within ten (10) days. As such, this defendant's corporate disclosure statement is due to be submitted by December 24, 2007.
3. Counsel for this defendant is attempting to obtain the requested information, but due to the holiday season has been unable to obtain the requested information and does not anticipate having the requested information by December 24, 2007.

WHEREFORE, premises considered, this defendant respectfully requests the Court for an additional ten (10) days to submit the requested F.R.C.P. 7.1 corporate/conflict disclosure statement.

Respectfully submitted this 21<sup>st</sup> day of December, 2007.

**s/Keith J. Pflaum**

Keith J. Pflaum

Bar Number: ASB-3002-A54K

Attorney for Defendant, Child Development  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 21<sup>st</sup> day of December, 2007, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Jerry D. Roberson, Esq.

Roberson & Roberson

P.O. Box 380487

Birmingham, AL 35238-0487

**s/Keith J. Pflaum**

Keith J. Pflaum

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